

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

ENERGIZER BRANDS II LLC,
ENERGIZER HOLDINGS, INC.,
ENERGIZER MANUFACTURING,
INC., and AMERICAN COVERS, LLC,

Plaintiffs,

vs.

PARADISE AIR FRESH, LLC, MARC
FUNDERLICH, and RYAN SIMONS,

Defendants.

Civil Action No. 4:19-cv-00429

JOINT STATUS UPDATE AND MOTION FOR ENTRY OF BRIEFING SCHEDULE

Pursuant to ECF 29 and 30, Plaintiffs Energizer Brands II LLC, Energizer Holdings, Inc., Energizer Manufacturing, Inc., and American Covers, LLC (collectively, “Plaintiffs”) and Defendants Paradise Air Fresh, LLC, Marc Funderlich, and Ryan Simons (collectively, “Defendants”) (Defendants and Plaintiffs collectively, the “Parties”) hereby jointly provide the Court with (a) a status report regarding the parties’ mediation and (b) a joint proposed schedule for Defendants to file their answer or responsive motion to Plaintiffs’ Amended Complaint.

Mediation Status Report

The parties engaged in mediation on September 5, 2019. The mediation did not result in a resolution to this case.

Proposed Schedule

The parties propose the following schedule for Defendants to file their answer or responsive motion to Plaintiffs’ Amended Complaint and any related briefing:

Defendants' Deadline to file a response to
Plaintiffs' Amended Complaint by Answer
or by Motion:

October 3, 2019

Plaintiffs' Deadline to Respond to any
Motion Filed by Defendants:

October 24, 2019

Defendants' Deadline to File Reply in
support of any Motion filed by Defendants:

November 7, 2019

WHEREFORE, for the foregoing reasons and good cause shown, the Parties respectfully
request that the Court enter the above-proposed briefing schedule.

DATED: September 12, 2019.

Respectfully submitted,

/s/ Jennifer Fairbairn Deal

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*Counsel for Defendants Paradise Air Fresh,
LLC, Marc Funderlich and Ryan Simons*

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2019, I electronically filed and serviced the foregoing Motion with the Clerk of the Court using CM/ECF on counsel for Defendants.

/s/ Jennifer Fairbairn Deal
Jennifer Fairbairn Deal